

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

GAIL CORVELLO, et al.,)	
Plaintiffs,)	C.A. No. 05-0221S
)	(Related Case Nos.: 05-522S,
v.)	05-274S, 05-370S)
)	
NEW ENGLAND GAS COMPANY;)	
SOUTHERN UNION COMPANY)	
Defendant and)	
Third-Party Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC and)	
HONEYWELL INTERNATIONAL INC.)	
Third-Party Defendants.)	

**JOINT MOTION TO CONTINUE HEARING DATE ON THE SIMPSON FAMILY
TRUST'S MOTION TO QUASH**

Non-Party the Simpson Family Trust (the “Trust”) and Third-Party Plaintiff Southern Union Company/New England Gas Company (collectively, “Southern Union”) jointly request that the Court continue the hearing on the Trust’s Motion to Quash the Subpoena of Southern Union, presently scheduled for May 30, 2012, for an additional thirty (30) days because an anticipated settlement between Southern Union and Third-Party Defendant Bridgestone Americas Tire Operations, LLC (“Bridgestone”) will obviate the need for the subpoena to inspect and sample the land at issue in the Trust’s Motion. Southern Union and Bridgestone have engaged in mediation, reached a settlement in principle, and are finalizing settlement documents. Southern Union’s anticipated settlement with Bridgestone, and Bridgestone’s dismissal from the case, will moot Southern Union’s subpoena to the Trust and, thus, the Trust’s

Motion to Quash such subpoena. For this reason, the Trust and Southern Union respectfully request that this Court continue the hearing on the Trust's motion for an additional thirty (30) days.

Respectfully Submitted,

SOUTHERN UNION COMPANY AND
NEW ENGLAND GAS COMPANY

By its Attorneys,

/s/ Robin L. Main

Gerald J. Petros (#2931)
Robin L. Main (#4222)
Hinckley, Allen & Snyder LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903
Tel. (401) 274-2000
Fax (401) 277-9600
gpetros@haslaw.com
rmain@haslaw.com

SIMPSON FAMILY TRUST,
By its Attorney,

/s/ Martin K. DeMagistris

Martin K. DeMagistris, Esq. (#6089)
Olenn & Penza, LLP
530 Greenwich Avenue
Warwick, RI 02886
Tel. (401) 737-3700
Fax (401) 737-5499

Dated: May 25, 2012

CERTIFICATE OF SERVICE

George E. Lieberman, Esq.
Benjamin V. White, Esq.
Kimberly A. Simpson, Esq.
Timothy M. Bliss, Esq.
Vetter & White
Center Place
50 Park Row West, Suite 109
Providence, RI 02903

Kerri L. Stelcen, Esq.
Kerry A. Dziubek, Esq.
Arnold & Porter LLP
399 Park Avenue
36th Floor
New York, NY 10022-4690

Gregory L. Benik, Esq.
Benik & Associates
128 Dorrance Street, Suite 450
Providence, RI 02903

William D. Wick, Esq.
Wactor & Wick LLP
180 Grand Avenue, Suite 950
Oakland, CA 94612

Martin K. DeMagistris, Esq.
Olenn & Penza, LLP
530 Greenwich Avenue
Warwick, RI 02886

I hereby certify that on the 25th day of May, 2012, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Robin L. Main

#50726783 (14015/126110)